

**THE LAW OFFICES OF KENNETH ARTHUR RIGBY, PLLC**

**Attorneys at Law**  
**15 Maiden Lane, Suite 1500**  
**New York, New York 10038**  
**(212) 629-7575**  
**Direct Dial (646) 490-9690**  
**Facsimile (646) 863-4248**  
February 20, 2015

The Honorable John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Hon. Steven M. Gold  
Chief Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Room 1217 (Chambers)  
Brooklyn, New York 11201

Re: Patrick Gill v. Christoph S. Bahlmann and Perini Corporation (United States District Court, Eastern District of New York; Case Number 13-CV-04477-JG-SMG)  
Our File Number: PZ-0015

Dear District Judge Gleeson and Chief Magistrate Judge Gold:

As you know, this law office represents the defendants, Christoph S. Bahlmann and Perini Corporation, in the above-referenced matter.

We are writing in response to plaintiff's counsel's letter, Document 29 on the ECF, which was filed moments ago, specifically that portion which states "we have no objection to adjourning the conference of February 23, 2015 to the March 26, 2015 conference date". In point of fact, this issue was never discussed with this firm and this firm does object to such an adjournment. So that we are clear, this firm has no objection to adjourning Monday's pre-motion conference for a brief time to March 2, 2015.

Thank you.

Respectfully submitted,

  
Kenneth Arthur Rigby (KR0266)

cc: David L. Scher, Esq.  
Block O'Toole & Murphy, LLP  
Attorneys at Law  
One Penn Plaza, Suite 5315  
New York, New York 10119